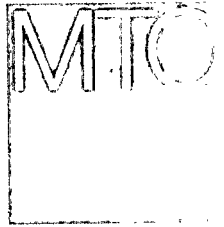


*In re*

DOCKET NO. 14-CRB-0001-WR  
(2016-2020)

Pandora has no basis for a motion to compel, as its request for an extension concedes. Pandora Motion to Extend Deadline at 3. Because it has no grounds for such a motion as of the day such motions are due, Pandora asks the Judges for an extension to come up with one. No extension is necessary. As of March 19, 2015, Pandora had all of the information it could require to determine whether it had concerns with SoundExchange's discovery efforts: (1) SoundExchange's explicit responses to Pandora's requests for production, which described exactly what lines SoundExchange intended to draw in producing documents; and (2) Over 90,000 pages of documents comprising the bulk of SoundExchange's production of documents across all categories – lest there be any doubt that SoundExchange intended to produce documents as it said it would.<sup>1</sup> Nothing prevented Pandora from raising any concerns it had with

<sup>1</sup> SoundExchange's production dwarfs the service-side participants' combined. As of today, SoundExchange has produced 433,172 pages of documents in both direct and rebuttal discovery. In response to rebuttal requests for production of documents, the service-side participants produced a collective 36,314 pages of documents as compared to the over 90,000 pages (footnote continued)



Munger, Tolles & Olson LLP

SOUNDEXCHANGE'S OPPOSITION TO PANDORA'S  
MOTION TO EXTEND DEADLINE TO MOVE TO  
COMPEL PRODUCTION OF DOCUMENTS BY  
SOUNDEXCHANGE

March 26, 2015